

1 J Christopher Jorgensen
2 Nevada Bar No. 5382
Matthew R. Tsai
Nevada Bar No. 14290
3 LEWIS ROCA ROTHGERBER CHRISTIE LLP
3993 Howard Hughes Parkway, Suite 600
4 Las Vegas, NV 89169
Phone: (702) 949-8200
5 Email: cjorgensen@lrrc.com
Email: mtsai@lrrc.com

6 *Attorneys for Defendant Synchrony Bank*

8 **IN THE UNITED STATES DISTRICT COURT
9 DISTRICT OF NEVADA**

10 AARON BLAZEVICH,

11 Plaintiff,

12 vs.

13 EXPERIAN INFORMATION
14 SOLUTIONS, INC., EQUIFAX
INFORMATION SERVICES, LLC,
TRANS UNION, LLC, SYNCHRONY
15 BANK, AND PORTFOLIO RECOVERY
ASSOCIATES, LLC,

16 Defendants.

Case No. 2:20-cv-1077-RFB-EJY

**JOINT MOTION AND ORDER TO
EXTEND DEFENDANT
SYNCHRONY BANK'S TIME TO
FILE RESPONSE TO COMPLAINT**

[FIRST REQUEST]

18
19 COME NOW Plaintiff Aaron Blazevich (“Plaintiff”) and Defendant Synchrony
20 Bank (“Synchrony”), by counsel and pursuant to Local Rule IA 6-1, jointly move for an
21 extension as follows:

22 **STATEMENT OF JOINT MOTION**

23 1. On June 16, 2020, Plaintiff filed a Complaint with this Court [ECF No. 1].
24 2. Synchrony was served with the Complaint on June 18, 2020 [ECF No. 5].
25 3. Synchrony’s response to the Complaint is due by July 9, 2020.
26 4. The parties are engaging in preliminary discussions in this matter. In order
27 to explore the possibility of an early resolution, Synchrony desires an extension of 21
28 (twenty-one) days, up to and including July 30, 2020, to file a response to the Complaint.

3993 Howard Hughes Pkwy, Suite 600
Las Vegas, NV 89169-5996

Lewis Roca
ROTHGERBER CHRISTIE

1 5. Counsel for Synchrony conferred with counsel for Plaintiff regarding this
2 extension and joint motion. Counsel for Plaintiff agrees to the requested extension.

3 6. This joint motion is filed in good faith and not for dilatory or other improper
4 purpose. Plaintiff would not suffer any prejudice by the Court permitting Synchrony the
5 requested extension of time and has consented to the requested extension.

6 7. This is the first request for extension of time for Synchrony to respond to
7 the Complaint.

8 | DATED: June 25, 2020.

DATED: June 25, 2020.

/s/ J. Christopher Jorgensen
J Christopher Jorgensen (NV Bar #5382)
Matthew R. Tsai (NV Bar #14290)
Lewis Roca Rothgerber Christie LLP
3993 Howard Hughes Pkwy, Suite 600
Las Vegas, NV 89169
Tel: 702-949-8200
Email: cjorgensen@lrrc.com
Email: mtsai@lrrc.com

/s/ Steven A. Alpert
Steven A. Alpert (NV Bar No. 8353)
Price Law Group, APC
5940 S. Rainbow Blvd, Ste. 3014
Las Vegas, NV 89118
Tel: (702) 794-2008
alpert@price-lawgroup.com

Attorneys for Defendant Synchrony Bank

ORDER

IT IS SO ORDERED.

Eayna J. Zouchah
UNITED STATES MAGISTRATE JUDGE

DATED: June 26, 2020

Lewis Roca
ROTHGERBER CHRISTIE